

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION

NATHANIEL THOMAS PETTIFORD,  
JR. : CIVIL ACTION NO.: 3:12-CV-2883  
  
VERSUS : JUDGE: ROBERT G. JAMES  
  
GRAPHIC PACKAGING  
INTERNATIONAL, INC. : MAGISTRATE: KAREN L. HAYES

AFFIDAVIT

STATE OF LOUISIANA  
  
PARISH OF OUACHITA

BEFORE ME, personally came and appeared, Ryan Canales, who after being duly sworn did depose and state that:

1.

He is employed at the Graphic Packaging International, Inc. [hereafter, GPI] facility in West Monroe, Louisiana as the Paper Machine Maintenance Superintendent.

2.

His job duties require him to be familiar with the work performed at GPI's plant in West Monroe, Louisiana and all maintenance performed on the paper machines.

3.

That there was an outage on the Number 6 Paper Machine in May, 2011.

4.

That the Number 6 Paper Machine maintenance shop only has 16 millwrights assigned to it at any one time. That on outage days all other maintenance areas send their millwrights to the outage for assistance.

5.

That the outages, including the May 2011 outage on the Number 6 Paper Machine, always have more work required than GPI can cover with internal resources.

6.

That all work beyond the capabilities of the internal resources is contracted out to third parties.

7.

That B&D was contracted out during the May 2011 outage to perform gear changes because GPI did not have the internal resources to do so during that outage.

8.

That the attached is a true and correct copy of the outage supplement for the May 2011 outage listing the names of every general mechanic that works in Plant 31 and where they were assigned to work on that outage day.

  
\_\_\_\_\_  
RYAN CANALES

SWORN TO AND SUBSCRIBED before me, Notary Public, this 28<sup>th</sup> day of

January, 2013.

  
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NOTARY PUBLIC #16104